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16 *Attorneys for Plaintiff* MEDIATEK INC.

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 OAKLAND DIVISION

20 MEDIATEK INC.

21 Plaintiff,

22 v.

23 FREESCALE SEMICONDUCTOR, INC.

24 Defendant.

Civil Action No. 4:11-cv-05341 (YGR)

DECLARATION OF
MH SHIEH IN SUPPORT OF
FREESCALE SEMICONDUCTOR
INC.'S ADMINISTRATIVE MOTION
TO FILE UNDER SEAL

DEMAND FOR JURY TRIAL

1 I, MH Shieh, declare as follows:

2 1. I am an employee of MediaTek Inc. ("MediaTek"), plaintiff in the above-
3 captioned matter. My current job title is Special Assistant to the General Manager. I submit this
4 declaration in support of Freescale Semiconductor Inc.'s ("Freescale") Administrative Motion to
5 File Under Seal Freescale's Motion to Exclude Certain Testimony of Catherine M. Lawton
6 ("Administrative Motion") pursuant to Local Rules 7-11 and 79-5. I have personal knowledge of
7 the facts set forth in this declaration and, if called to testify as a witness, could and would do so
8 competently.

9 2. Freescale's Administrative Motion seeks to have filed under seal confidential,
10 unredacted versions of Freescale's Motion to Exclude Certain Testimony of Catherine M.
11 Lawton ("Freescale's Motion") and Exhibits 1, 3 and 6 to Freescale's Motion. Freescale's
12 Motion and Exhibits 1, 3, and 6 contain information concerning MediaTek's acquisition of the
13 patents-in-suit and patent licensing.

14 3. MediaTek does not publicly disclose information concerning its patent
15 acquisitions and licensing practices. Instead, MediaTek protects this information as a trade secret,
16 and takes steps to ensure that this information remains confidential, including marking the
17 information included in Freescale's Motion and Exhibits 1, 3, and 6 as "HIGHLY
18 CONFIDENTIAL – ATTORNEYS' EYES ONLY" when MediaTek produced this information
19 in this action. If this information were publicly disclosed, MediaTek's competitors could use the
20 information in Freescale's Motion and Exhibits 1, 3, and 6 to MediaTek's economic
21 disadvantage by tailoring their negotiation strategies regarding intellectual property transfers and
22 licensing to exploit MediaTek's practices.

23 4. The requested relief is narrowly tailored to protect the confidentiality of this
24 information. Only those portions of Freescale's Motion and Exhibits 1, 3, and 6 that describe the
25 MediaTek's practices regarding patent acquisitions and licensing are covered by Freescale's
26 Administrative Motion.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.

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4 Dated: November 11, 2013

5
6 *Meng-Hann Shieh*

7 MH Shieh
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